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December 2, 2019

VIA EMAIL TO VALPEC@KIRTLANDPACKARD.COM

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Re: ***In re Valsartan Products Liability Litigation***, Civ. No. 19-md-2875 (D.N.J.)
Facility and Testing Information

Counsel:

Pursuant to the Court's November 25, 2019 Order (Dkt. 303), Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP") and Princeton Pharmaceutical Co. ("Princeton") provide the following information:

I. Identification of Facilities

As disclosed in a letter to Plaintiffs dated September 16, 2019, ZHP manufactures valsartan API at its Chuannan facility, located at Coastal Industrial Zone, Duqiao, Linhai, Zhejiang, 317016, China; and valsartan finished dose products at its Xunqiao facility located at Linhai, Zhejiang, 317024, China. ZHP began manufacturing valsartan API at the Chuannan facility in 2007, and began manufacturing valsartan finished dose at the Xunqiao facility in 2015.

II. Identification of Testing

The types of testing performed during the valsartan API and finished dose manufacturing processes are identified in Princeton's ANDAs and ZHP's DMF in the documents that begin with the following Bates numbers:

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ANDA 204821:

PRINSTON00020754, PRINSTON00020496, PRINSTON00020500, PRINSTON00020504,
PRINSTON00020717, PRINSTON00020722, PRINSTON00020726, PRINSTON00020730,
PRINSTON00022317, PRINSTON00033450.

ANDA 206083:

PRINSTON00039378, PRINSTON00079310, PRINSTON00079329, PRINSTON00039337,
PRINSTON00039341, PRINSTON00039345, PRINSTON00039349, PRINSTON00039354,
PRINSTON00039359, PRINSTON00039362.

DMF 023491:

PRINSTON00009342, PRINSTON00017627, PRINSTON00018280, PRINSTON00009363,
PRINSTON00010648, PRINSTON00010903, PRINSTON00009782, PRINSTON00011393,
PRINSTON00018695, PRINSTON00010529.

DMF 020939:

PRINSTON00078435, PRINSTON00078548, PRINSTON00078700.

In providing this information, ZHP and Prinston expressly reserve all objections to discoverability and admissibility—including their objections to the scope of testing relevant to the issues in these actions—as well as all defenses, jurisdictional or otherwise.

Very truly yours,

/s/ Seth A. Goldberg

Seth A. Goldberg

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